Merritt Timber Supply Area
Summary of Public Input
B.C. Ministry of Forests

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Merritt Timber Supply Area, Summary of Public Input

Merritt Timber Supply Area

Timber Supply Review

Summary of Public Input

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This is a summary of the public input that has been received on the Timber Supply Review in the Merritt Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

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Background

As part of the review of timber supply in the Merritt Timber Supply Area, the British Columbia Forest Service distributed a *Discussion Paper* and two technical reports; the *Timber Supply Analysis* and the *Socio-Economic Analysis*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information. This report summarizes the input received during the 90-day review period. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut for the Merritt Timber Supply Area.

The first section of this summary outlines the public review process implemented by the Forest Service and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Privacy Act*) can be reviewed at the Merritt Forest District office.

Public Review Process and Response

Merritt District Staff actively solicited public input on the Timber Supply Review in the Merritt Timber Supply Area through the following actions:

- direct mail-out of the three documents to 29 organizations and businesses within and adjacent to the Merritt Timber Supply Area. The *Discussion Paper* included a response form which readers were encouraged to complete and return to the district manager

- 15 information sessions were held with representatives from the timber industry, labour, local governments, First Nations and other interest groups (see Table 1)

- two open houses were advertised in local newspapers, on local radio stations and through a direct mail-out

- newspaper articles were encouraged

As Table 1 shows, over 400 people participated in the information sessions and open houses. The Merritt Forest District also received 15 completed response forms from the public and seven written submissions including a technical critique from the Merritt Forest Licencees (see Appendix 1).

Activities (No. of participants)	**Date**
Meetings with interest groups	
Nicola Watershed	Feb. 15, 1995
Community Roundtable (30) Ardew Wood Products (100)	Feb. 21, 1995
Princeton Rotary Club (25)	April 11, 1995
Merritt Rotary Club (25)	April 13, 1995
Local government	
Princeton (6)	April 3, 1995
Merritt (10)	March 28, 1995
First Nations (46)	
Upper Similkameen	Feb. 20, 1995
Lower Similkameen	Feb. 20, 1995
Upper Nicola	March 31, 1995
Lower Nicola	April 30, 1995

Coldwater	May 30, 1995
Nooaitch	May 31, 1995
Shackan	May 24, 1995
Open Houses/Public Meetings	
Merritt (120)	Feb. 28, 1995/March 1, 1995
Princeton (85)	March 2, 1995/March 3, 1995

Table 1: Participation in public information activities

Public Input

In this section, public input on the information presented in the three Timber Supply Review documents for the Merritt Timber Supply Area is summarized under the following headings:

- timber supply analysis
- socio-economic analysis
- discussion paper

Public input on other ongoing government processes that may influence the timber supply in the Merritt Timber Supply Area in the future is summarized at the end of this section.

Timber Supply Analysis

Technical input

A comprehensive technical critique of the Forest Service timber supply analysis was received from the Merritt Forest Licencees. Other technical input was received from the Ministry of Environment, Lands and Parks and the Interior Lumber Manufacturers' Association.

The technical critique submitted by the Merritt Forest Licencees reviews the Merritt *Timber Supply Analysis Report* , the *Socio-Economic Analysis* and the *Discussion Paper*. The Merritt Forest Licencees are of the opinion that the Forest Service analysis of the Merritt Timber Supply Area is conservative for the following reasons:

Inventory information

- **Age class structure**

The Forest Service analysis indicates that 77 per cent of the land base is composed of mature forests. Of these mature forests, fifty-two per cent are lodge pole pine forests. The Merritt Forest Licencees assert that the current age class structure and the structure in 50 years are cause for concern.

The Merritt Forest Licencees maintain that the high proportion of mature forests increase the risk of timber volume losses due to insects, disease, fire and windthrow. They suggest the current level of harvest may not accommodate future increases in salvage harvesting.

The Interior Lumber Manufacturers' Association also expresses concern about the number of mature forests in the Merritt Timber Supply Area. They state that the long term sustainability of timber supply is at "significant risk".

- **Site index estimates**

Site index is a measure of the ability of an area to produce trees. The Merritt Forest

Licencees suggest that site indices derived from existing forests underestimate the site indices of future managed forests. The underestimation of replacement forest productivity reduces potential volume and overstates the time required to achieve "green-up" and mature height.

A submission from the Interior Lumber Manufacturers' Association also suggests that the site indices used in the Forest Service analysis underestimate future growth and volumes for areas harvested and reforested.

The Merritt Forest Licencees made a number of other points regarding the analysis of inventory information, including:

- mature volume estimates are reasonable, but could possibly be higher
- the managed forest equations for existing and future regenerated forests are appropriate
- the estimate of 84 years as a minimum harvest age is acceptable. In the future, minimum volume and diameter should be decided in conjunction with the Merritt Forest Licencees
- the operational adjustment factors of 15 per cent and five per cent used in the analysis are conservative

Land base assumptions

In order to carry out a timber supply analysis, the land base available for timber harvesting must be defined. The timber harvesting land base of the Merritt Timber Supply Area was determined by deducting all areas which were considered to be unavailable for harvest at the time of the analysis. Several of the deductions prompted comment.

- **Roads, landings and trails**

The Merritt Forest Licencees believe the 11.3 per cent reduction for roads, landings and trails is conservative. Their examination produced a figure three per cent less for existing losses and 0.4 per cent less for future losses.

- **Inoperable areas**

The Merritt Forest Licencees state that definition of inoperable areas should be completed prior to the next analysis.

- **Reduction for Stoyoma Mountain**

The Merritt Forest Licencees assert that Stoyoma Mountain should not have been removed from the timber harvesting land base in the Forest Service analysis as the area has not been designated as wilderness.

Forest management practices

The *Kamloops Regional Integrated Resource Management Timber Harvesting Guidelines* were utilized to divide the timber harvesting land base into management zones based upon specific forest cover guidelines and management practices. The Forest Service analysis is based upon the assumptions set forth by these guidelines.

- **Green-up**

The green-up period is the estimated time required for trees in an area to reach a specified height after harvesting. For the Merritt Timber Supply Area, green-up heights are three metres in the ungulate winter range and integrated resource management zones, and 5.5 metres in the landscape management zone. The base case scenario indicates the green-up period ranges from 14 to 23 years. The Merritt Forest Licencees assert that the 14 to 23 year time spans to achieve green-up in the Forest Service analysis are too long. They claim a reduction by five years would maintain the harvest level for an additional 10 years.

- **Landscape management zone**

The objective of the landscape management zone (as defined in the Forest Service analysis) is to maintain visual quality along corridors where people live, work, recreate and travel.

The Merritt Forest Licencees suggest that the guidelines used in establishing the landscape management zone result in harvest ages in excess of 200 years. They emphasize that the Merritt Timber Supply Area has a high proportion of mature lodge pole pine which is susceptible to infestation by mountain pine beetle. The Merritt Forest Licencees predict that this strategy may result in many visible areas covered with dead trees due to the length of rotation.

The Merritt Forest Licencees are also concerned with the application of the landscape management zone to the Three Brothers Trail in Manning Park and to Stoyoma Mountain. They maintain that the application of the landscape management zone to these areas does not reflect current practice.

- **Ungulate winter range zone**

The objective of this zone and the selection management zone is to maintain or enhance forage by ensuring adequate forest cover for deer and other related species.

The Merritt Forest Licencees accept that no more than 20 per cent of the gross land base should be below green-up height, but they believe the figure should be adjusted for the gross to net area relationship. They suggest that areas which have been removed from the timber harvesting land base (i.e. riparian areas and environmentally sensitive areas) may also contribute to forest cover requirements. The Merritt Forest Licencees point out that selection management zones and problem forest type areas

also contribute to ungulate winter range requirements.

- **Integrated resource management zone**

The objective of this zone is management considering other resource values. The Merritt Forest Licencees state that the Forest Service analysis modelled the maximum gross area on the basis of 25 per cent of the forest being below green-up. Current guidelines specify that 30 per cent of the forest should be below green-up and the Merritt Forest Licencees maintain that current practices should be modelled.

- **Old growth**

The Merritt Forest Licencees assert that it is appropriate that old growth requirements were not modelled in this analysis. They note that the Old Growth Strategy has been incorporated into the Protected Areas Strategy and that Protected Areas have not been finalized in the Merritt Timber Supply Area. They maintain that the Forest Service analysis should model current management practices. They assert that interim old growth reserves are unnecessary due to the large proportion of mature forests within the timber supply area.

A submission from the Ministry of Environment, Lands and Parks states that an old growth strategy should have been modelled in the Forest Service analysis. They consider that trees 140 years old meet the minimum requirement for old growth. They claim that 50 years from now only six per cent of the timber harvesting land base will be over 200 years of age. They maintain that 10 per cent old growth should be the desired goal.

- **Riparian areas**

The Merritt Forest Licencees critique states that the Forest Service analysis exceeded the current requirements for riparian management.

In contrast, a submission from the Ministry of Environment, Lands and Parks suggests:

"A serious flaw of the current Timber Supply Review is that it does not take into account riparian or biodiversity management requirements under the Forest Practices Code or removals from the timber harvesting land base under the Protected Areas Strategy."

The Forest Service analysis is required to model current forest management practices or policies and procedures which are in place at the time of the analysis. The Ministry of Environment emphasizes that although these are not current management practices, they will be in the near future. They suggest that it would have been better to estimate the effect of these factors rather than to exclude them from the analysis.

- **Wildlife corridors**

The Merritt Forest Licencees indicate that it is appropriate that wildlife corridors and Forest Ecosystem Networks were not modelled in the Forest Service analysis. The suggest the goals, objectives and attributes of wildlife corridors and Forest Ecosystem Networks must first be finalized.

- **Other technical comments**

The Merritt Forest Licencees made a number of other points:

- regeneration delays of four to six years used in the analysis are conservative
- it is likely that unsalvaged losses will decrease as access is increased
- increased flexibility is required in harvest systems and cutblock layout. At present, locating sufficient blocks for Development Plans has not been constraining

Other public input

- **Medicinal plants and wildlife habitat**

A concern was raised regarding the lack of modeling for medicinal plants and wildlife habitat in the Forest Service analysis.

Socio-Economic Analysis

The Interior Lumber Manufacturers' Association prepared a comprehensive response to the Merritt Timber Supply Area *Socio-Economic Analysis.* Other comments regarding the *Socio-Economic Analysis* were received from the Merritt Forest Licencees and the Ministry of Environment, Lands and Parks.

- **Presentation of the data**

The three submissions comment on the manner in which the data was presented to the reader in the *Socio-Economic Analysis*. Comments suggest the information was presented in a biased manner. The Merritt Forest Licencees state:

" The Socio-Economic Analysis understates the effects of a sustained or enhanced harvest level relative to the perceived benefits of a decreased harvest level "

The Interior Lumber Manufacturers' Association note:

"The economic and social impacts of the increased harvest option are unfairly described."

The Interior Lumber manufacturers also maintain that statements written in reference to the increased harvest scenario have negative connotations. They suggest the reader may develop a negative perspective due to:

- the significance of mill capacity being poorly reflected
- the suggestion that any new jobs from an increase in harvest may go to people outside the timber supply area rather than residents
- the implication that an increase in harvest could lead to an increase in population which could create "problems" in the community

The Interior Lumber Manufacturers' Association maintain that all leading statements should be substantiated or eliminated from future reports.

On the other hand, the Ministry of Environment, Lands and Parks indicates the results were biased in the opposite way:

- First Nations survey results emphasize employment concerns rather than environmental concerns
- a statement regarding grazing tenures leads the reader to believe 94 per cent of the timber supply area is grazed

- a statement implying timber supply area dependence on the livestock industry is contrary to the data presented which shows the industry accounts for four per cent of employment

- the benefits of selection management are overstated

- **Environmental impacts**

The Interior Lumber Manufacturers' Association suggest that the concerns of the Ministry of Environment, Lands and Parks as presented in the *Socio-Economic Analysis* are not necessarily relevant to the Merritt

Timber Supply Area, and do not provide useful information for evaluating the effects of the various harvest scenarios. The Interior Lumber Manufacturers' Association requests that only environmental concerns specific to the timber supply area be provided in future analyses.

- **Employment**

Both the submission from the Interior Lumber Manufacturers' Association and the submission from the Merritt Forest Licencees suggest that harvest dependent employment is underestimated in the *Socio-Economic Analysis*. They observe that Ministry of Forests employment also relies on harvesting timber and should not have been excluded from the employment figures.

The Interior Lumber Manufacturers' Association suggests that underestimated employment figures were due to:

- employment related to capital expenditures are not estimated

- Riverside Forest Products non-processing employment is excluded

- silviculture contractors residing outside the timber supply area are excluded

Two submissions indicate the *Socio-Economic Analysis* did not clearly identify direct forestry employment. Both state that it was unclear whether wood processing jobs were located under the manufacturing category.

The Interior Lumber Manufacturers' Association suggests that the size of the tourism industry relative to the forest industry is overstated. Upon examination of the 1995 Ministry of Finance paper on *Economic Dependencies*, the Interior Lumber Manufacturers' Association states:

"...each forestry job generates more than two and one half times as much after tax basic income as each tourism job does...this difference in after tax earnings can only be explained in one of two ways -- either the number of tourism jobs is overstated relative to number of forestry jobs or the level of annual earnings in the tourism sector is well below the poverty level."

The Interior Lumber Manufacturers' Association stresses that the provincial job multiplier used in the *Socio-Economic Analysis* is too low. A statement was made at the public meeting in Merritt (March 1, 1995) indicating that the figure for indirect and induced employment seemed low. One written submission from the public states:

"The Socio-Economic Analysis grossly underestimates the effect of forestry on the local economy."

- **Revenue**

Both the Interior Lumber Manufacturers' Association and the Merritt Forest Licencees state that government stumpage revenue is greatly understated in the *Socio-Economic Analysis*. Both comment that government revenue does not take into account for the 136 per cent stumpage rate increase that occurred in 1994.

The Interior Lumber Manufacturers' Association state that federal government revenue impacts should be considered in the analysis.

- **Water and watersheds**

Both the Interior Lumber Manufacturers' Association and the Merritt Forest Licencees are concerned about the discussion of water, community watersheds and the hydrological impacts of forestry activities in the *Socio-Economic Analysis*. The Merritt Forest Licencees state:

"The impacts referred to are worst case, alarmist, largely unsubstantiated, and in some cases, not true."

The Interior Lumber Manufacturers' Association refers to some of the information in the *Socio-Economic Analysis* as "alarmist" and "incorrect". Both the Interior Lumber Manufacturers' Association and the Merritt Forest Licencees claim that although some of the comments may be true in the worst case, they have not been provided in the proper context. The Interior Lumber Manufacturers' Association suggest that some of the concepts presented are unwarranted in light of new forest management requirements in riparian areas.

The Interior Lumber Manufacturers' Association notes the following specific problems in the *Socio-Economic Analysis*:

- the characterization of the relationship between logging and increased bacteria levels in streams
- the characterization of the relationship between loss of forest cover and reduction of overall water yield

Additionally, the Interior Lumber Manufacturers' Association observes that statements made regarding the impact of forest management on salmon are unsubstantiated.

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Discussion Paper

The *Discussion Paper* prompted input on several issues.

- **Timber utilization**

The Merritt Forest Licencees consider the description of timber utilization in the *Discussion Paper* is incorrect. They assert that there is no mandatory requirement to utilize dead wood volume or material suitable for pulp chipping.

One public response form comments on timber utilization:

"Logs should not be chipped for the sake of high chip prices. Our direction must continue to be for maximum log recovery even for small diameter logs."

- **Intensive silviculture**

Four submissions comment on the importance of intensive silviculture. The submissions suggest intensive silviculture treatments could potentially result in higher harvestable volumes and could provide an avenue to maintain the allowable annual cut in the future. One respondent states that intensive silviculture could result in more timber supply area employment.

- **Unsalvaged losses**

One comment was received regarding unsalvaged losses. It indicates that stronger attempts to utilize blow down and beetle damaged timber should be made using horse and helicopter logging.

- **Water and watersheds**

Three respondents indicate the importance of watershed maintenance and the protection of water habitat. One respondent states:

"I agree with protecting watercourses and hydrological values, but sensibly. Modern equipment permits selective logging of old trees without damaging the area."

- **Employment**

Four respondents mention the importance of the timber industry as a source of employment and an avenue for future job creation in the Merritt Timber Supply Area.

- **Allowable annual cut adjustment**

The Merritt Forest Licencees suggest that the base case scenario is supportable longer than 110 years as shown in the Forest Service analysis. They indicate that the allowable annual cut should not be decreased. The Merritt Forest Licencees state:

"The high component of mature and over-mature stands increases the risk of loss to disease, insects, fire and/or windthrow. The determined harvest level must be at a level to maintain existing salvage programs, as well as, allow for the orderly and timely harvest of the forest. Any reduction to the current harvest level would threaten this process."

The Merritt Forest Licencees emphasize that a reduction in cut would immediately impact the operation of the mills as wood supply cannot be obtained from other sources.

The Ministry of Environment Lands and Parks recommends a decrease in the allowable

annual cut. They claim that the base case shown in the Forest Service analysis could result in the reduction of old growth forests which may put species requiring old growth habitat at risk. The Ministry of Environment, Lands and Parks recommends an immediate five to 10 per cent reduction in the allowable annual cut, with a reduction to the long run sustainable yield in less than 140 years.

The Ministry of Environment, Lands and Parks suggests a separate allowable annual cut be set for small wood forests. They suggest that this would offset the effect of a reduction in the allowable annual cut of the commercial forest.

Three respondents would like to see the allowable annual cut increased. All three made reference to the high component of mature small wood currently excluded from the land base. Respondents indicate that small wood should be harvested to:

- create a graduated maturity level to ensure a sustainable yield
- make room for quality forests
- increase industry stability

Although few respondents directly address the allowable annual cut, seven respondents mention the dependence of timber supply area communities on the forest industry. Three respondents suggest that any reduction in the allowable annual cut would have an effect on the local economy. One states:

"A sufficient volume of timber must be made available to sustain existing timber processing businesses without whom, our employment base in the region would be decimated."

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Small Wood Inventory

The *Small Wood Inventory Report* identified approximately 8,250,000 cubic metres of timber which are currently excluded from the timber harvesting land base, to be suitable for harvesting and milling using current technology.

By far, the recently inventoried small wood drew the largest number of public comments. A total of 11 respondents indicate that the small diameter lodge pole pine identified in the *Small Wood Inventory Report* should be made available for harvest. The implication is that this would be a means of avoiding a reduction in harvest and would possibly provide an "opportunity" to increase the harvest level.

A few common reasons given for making the small diameter pine available were:

- it has reached maturity
- it is susceptible to beetle infestation, disease, fire and wind
- some businesses requiring small wood cannot access it and must trade sawlog to obtain it

Many respondents indicate that the small wood should be harvested before it goes to waste; once harvested, it would be replaced with a modern timber crop from which the timber supply area would benefit.

A few submissions were made regarding how to incorporate the small wood into the timber harvest. Three respondents suggest creating a separate allowable annual cut for small wood forests.

Weyerhaeuser Canada Ltd. suggests that the time frame mentioned in the Forest Service analysis for harvesting small wood forests is too lengthy. The Weyerhaeuser believes that it would be more reasonable to harvest a volume of 8,254,000 cubic metres over a 15 to 20 year term as suggested in the *Small Wood Inventory Report*.

Tolko Industries Ltd. also recommends a shorter time frame for first pass harvest than suggested in the Forest Service analysis. Tolko states that lodge pole pine forests are highly susceptible to beetle attack when they are between 100 and 120 years of age. Tolko suggests a harvest and renewal time frame of between 40 to 50 years and that a partitioned incremental allowable annual cut for the small wood be set between 326,000 to 407,000 cubic metres.

An additional 67,052 hectares of problem forest types were identified in the *Small Wood Inventory Report*. Tolko suggests that the benefits of bringing this timber into the managed land base should be explored.

Related processes

Comments on other ongoing government processes in the Merritt Timber Supply Area are summarized here to indicate perspectives on issues that may influence timber supply in the future.

- **Protected Areas Strategy**

Concerns about the effect of the Protected Areas Strategy on the allowable annual cut were raised at the public meetings in Merritt and Princeton. The Ministry of Environment, Lands and Parks states that the Forest Service analysis should have attempted to predict the impact of the Protected Areas Strategy as it will have an effect on the allowable annual cut in the future.

- **Forest Practices Code**

The Ministry of Environment, Lands and Parks is of the opinion that the effects of the Forest Practices Code should have been estimated in the Forest Service analysis. They assert that the Forest Practices Code will reduce the land base available for harvesting.

Appendix 1

Submissions received by the Merritt Forest District

Government agencies
Ministry of Environment, Lands and Parks, Habitat Protection Section (two submissions)

Industry
Merritt Forest Licencees (Ardew Wood Products Ltd., Aspen Planers Ltd., Riverside Forest Products Ltd., Tolko Industries Ltd., Weyerhaeuser Canada Ltd.)
Weyerhaeuser Canada Limited, Kamloops
Tolko Industries Limited, Nicola Division
Interior Lumber Manufacturers' Association, Kelowna (two submissions)

Individuals
15 response forms